

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 23-mj-02178-AOR

UNITED STATES OF AMERICA

vs.

James SOLAGES, a/k/a "Yakov," a/k/a "Junior";
Joseph VINCENT, a/k/a "Blanco," a/k/a "Mr. White"
and German Alejandro RIVERA GARCIA,
a/k/a "Colonel Mike"

Defendants.

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CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,

AR A O
UNITED STATES ATTORNEY

By: /s/ Andrea Goldbarg
/s/ Monica Castro
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UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America)
v.)
James SOLAGES, a/k/a "Yakov," a/k/a "Junior";) Case No. 23-mj-02178-AOR
Joseph VINCENT, a/k/a "Blanco," a/k/a "Mr. White";)
and German Alejandro RIVERA GARCIA, a/k/a)
"Colonel Mike")
Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 1, 2021 through July 7, 2021 in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2339A 18 U.S.C. § 956(a)(1)	Providing Material Support Resulting in Death Conspiracy to Kill or Kidnap outside the United States

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.


Complainant's signature

FBI SA Thomas Pavletic
Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTime

Date: 1/31/2023


Judge's signature

City and state: Miami, Florida

Hon. Alicia M. Otazo-Reyes, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF SUPERSEDING CRIMINAL COMPLAINT¹

I, Thomas Pavletic, being first duly sworn, hereby depose and state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), having been so employed since 2019. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in the United States Code. I am currently assigned to the FBI’s Miami Division. As a Special Agent with the FBI, I have received general law enforcement training, and I have been personally involved in investigations concerning a variety of violations of federal offenses, including the provision of material support to terrorism, conspiracy to murder or kidnap outside the United States, violent crime, and other violations of federal law.

2. This Affidavit is submitted for the limited purpose of establishing probable cause to charge and arrest James SOLAGES, a/k/a “Yakov,” a/k/a “Junior” (“SOLAGES”); Joseph VINCENT, a/k/a “Blanco,” a/k/a “Mr. White” (“VINCENT”); and German Alejandro RIVERA GARCIA, a/k/a “Colonel Mike (“G. RIVERA”) for (1) a violation of 18 U.S.C. § 2339A, providing material support and resources² resulting in death, and conspiring to do so, knowing or intending that such support and resources are to be used to prepare for, or carry out, enumerated violations, including a violation of 18 U.S.C. § 956, which prohibits conspiracy to murder or

¹ On December 20, 2022, the Honorable Chris M. McAliley, United States Magistrate Judge for the Southern District of Florida, authorized a complaint (the “Complaint”) charging the individuals identified herein with the offenses identified herein. 22-mj-04164-McAliley. Due to an administrative error, the Complaint inadvertently identified defendant Joseph Vincent as “James” Vincent. The attached Affidavit and supporting materials are submitted to correct that error. Apart from that revision and the information associated with a new affiant, the substance of this submission is otherwise unchanged.

² “Material support or resources” includes, in relevant part, “any property, tangible or intangible, or service, including currency or monetary instruments or financial services, lodging, training, expert advice or assistance, safehouses . . . weapons . . . personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339A(b)(1).

kidnap outside the United States; and (2) a violation of 18 U.S.C. § 956(a)(1), Conspiracy to Kill or Kidnap outside the United States.³

3. I am personally involved in this investigation, along with other law enforcement agents, including other FBI agents and Homeland Security Investigations (“HSI”) agents. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, it does not contain all the information known about this investigation. The facts and information contained in this Affidavit are based on my personal knowledge and observation, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation, as well as the review of records, documents, and other physical items obtained during the course of this investigation.

PROBABLE CAUSE

4. On July 7, 2021, the President of Haiti, Jovenel Moise, was assassinated in his residence in Port-au-Prince, Haiti. The First Lady (“M.M.”), suffered multiple gunshot wounds. M.M. survived and received medical treatment in Miami.

5. According to statements made by Haitian authorities and the autopsy performed by Haitian officials, the President was shot twelve times and died as a result. Haitian authorities arrested numerous individuals in connection with the assassination, including several dual Haitian-American citizens (including SOLAGES and VINCENT) and a number of Colombian nationals (including G. RIVERA).

6. Through witness interviews and the review of records and seized electronic evidence, the investigation has revealed that in or around April 2021, in the Southern District of

³ 18 U.S.C. § 956(a)(1) provides, in relevant part, “[w]hoever, within the jurisdiction of the United States, conspires with one or more other persons, regardless of where such other person or persons are located, to commit at any place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect any object of the conspiracy, be punished”

Florida, SOLAGES attended meetings, which included Joseph Joel John⁴ and others, to discuss Haitian regime change and support for the political candidacy of a Haitian-American (“Individual-1”). After the meeting, John texted a list of equipment and weapons necessary for the “operation” to SOLAGES. The list included, among other things: “M-4” rifles, “M-60” machineguns, “Kalashnikov[s],” pistols, silencers, “hand grenades frags [sic],” a “gas mask.” “helmets,” “full bulletproof [sic] vests,” 4 “RPG” [rocket-propelled grenades], “tears [sic] gas,” and over \$13,000 in ammunition.

7. On May 7, 2021, VINCENT texted SOLAGES a video of a cat reacting alertly to the sound of gunfire in the background. SOLAGES responded with a series of laughing emojis and stated “HahHa” and “That is to [sic] funny,” to which VINCENT responded, “That’s the way Jovenel [President Moise] will be pretty much, but sonner [sic] if you guys really up to it!!” SOLAGES then responded, “[t]his cat will never come back” and “trust me brother, we definitely working our final decision.”

8. The investigation has revealed that in or around early June of 2021, a group of approximately twenty Colombian nationals with military training were recruited to assist in the “operation.” The lead Colombian national in charge of the group was G. RIVERA.

9. In or around mid-June, the conspirators had decided that Individual-1 was not a viable option to take over from President Moise; the group therefore largely shifted its support to a former Haitian Supreme Court Judge (“Individual-2”). The conspirators obtained documents containing Individual-2’s apparent signature, including one that included a written request for assistance to further the arrest and imprisonment of President Moise, as well as purporting to provide Haitian immunity for such actions.

⁴ John has been charged by indictment, along with Mario Antonio Palacios Palacios and Rodolphe Jaar, with conspiracy to kidnap or kill outside the United States, in violation of 18 U.S.C. § 9569(a)(1), and providing material support to such conspiracy, in violation of 18 U.S.C. § 2339A. Case No. 1:22-cr-20104-JEM(s)(s).

10. According to the evidence, there was a plan was to “arrest” President Moise from Haiti on or about June 19, 2021. SOLAGES, VINCENT, G. RIVERA, and other conspirators communicated by text message about their plans to “arrest” President Moise, detain him, and take him away in an airplane to an unknown location. The plan did not go forward when the conspirators failed to obtain the plane and necessary weapons for the operation.

11. On or about June 28, 2021, in furtherance of and to effect the object of the conspiracy, SOLAGES traveled from Haiti to the United States, specifically the Southern District of Florida, and provided other individuals with the document, apparently signed by Individual-2, that purported to give Haitian immunity for furthering the arrest and imprisonment of President Moise. On or about July 1, 2021, SOLAGES flew from Florida to Haiti to participate in the operation.

12. According to multiple witness interviews, on or about July 6, 2022, several conspirators (including SOLAGES, VINCENT, and G. RIVERA) met prior to the assassination at a house nearby President Moise’s residence. Firearms and equipment were distributed, and SOLAGES falsely told those gathered that it was a “CIA Operation,” and, in substance, said that the mission was to kill President Moise.

13. According to multiple witness interviews, on or about July 7, 2021, several conspirators drove in a convoy to President Moise’s residence. SOLAGES, G. RIVERA, and VINCENT travelled in the same vehicle. Once they arrived outside President Moise’s residence, SOLAGES announced that they were engaged in a “DEA Operation” to ensure compliance from President Moise’s security and other civilians. A subset of Colombian conspirators was assigned to find the President and assassinate him, and in fact the President was killed.

14. On or about July 22, 2021, United States law enforcement officers interviewed SOLAGES while he was in Haitian custody. SOLAGES was *Mirandized* and voluntarily agreed

to speak to the United States officers. SOLAGES admitted, in substance, that, by mid-June 2021, he knew that the plan was to ultimately assassinate President Moise.

15. On or about July 20, 2021, United States law enforcement officers interviewed VINCENT while he was in Haitian custody. VINCENT was *Mirandized* and voluntarily agreed to speak to the United States officers. VINCENT admitted, in substance, that the plan was to remove Moise from power or eliminate him completely. He stated the idea of assassination became accepted by the members of the conspiracy a few days prior to the event.

16. On or about July 27, 2021, United States law enforcement officers interviewed G. RIVERA while he was in Haitian custody. G. RIVERA was *Mirandized* and voluntarily agreed to speak to the United States officers. G. RIVERA admitted, in substance, that prior to the assassination, everyone involved in the conspiracy understood that the plan was an assassination, with the arrest plan being a pretense for their actions.

17. Based on the foregoing, your Affiant respectfully submits that there exists probable cause to believe that SOLAGES, VINCENT, and G. RIVERA committed the offenses of 18 U.S.C. § 2339A, Providing Material Support or Resources to Carry out a Violation of Section 956,

Resulting in Death; and 18 U.S.C. § 956(a)(1), Conspiracy to Kill or Kidnap a person outside the United States.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Special Agent Thomas Pavletic
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements
of Fed. R. Crim. P. 4.1 by FaceTime this 31st day of January, 2023.



HONORABLE ALICIA MOTAZO-REYES
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA